

HeidelbergCement (Africa Region): Corporate Environmental and Social Action Plan – December 2009

PS#	Issue & Task (Description of the requirement to be met by the project proponent)	Indication of Completion (Objective evidence to be supplied by project proponent to IFC)	Required Completion Date (Calendar date, condition of disbursement etc.)
PS 1	Comply with national regulatory requirements for new developments.	Submission of written confirmation of acceptance from regulatory authorities for new developments.	Prior to construction of new developments.
PS 1	Undertake an Environmental and Social Assessment (ESIA) for all proposed new developments (including the development in West Africa), that complies with IFC's requirements. Such assessments are to be undertaken by an organization acceptable to both parties.	a) Submission of agreed ToR / appointment of organization. b) Submission of agreed ESIA's for new developments.	a) Prior to commencement of ESIA. b) Prior to construction of new developments.
PS1	Develop and implement a formal environmental management system, at all applicable facilities, in accordance with the IFC Performance Standards, EHS Guidelines, HeidelbergCement's environmental policy, and using the principles of ISO 14001. As per the system, environmental management plans (EMP) and associated procedures are to be defined for the following, at all facilities: • Storage and disposal of solid waste; • On-site storm water management and disposal; • Disposal of waste water (sewerage and canteen waste); • Abatement and control of point source and fugitive emissions; and • Storage and disposal of hazardous	a) Submission of EMS documentation (policy, objectives, targets, procedures etc.). b) Submission of EMP / procedures as defined.	a) Eighteen months after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier. b) 6 months after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier.

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	materials (oils etc.).		
PS1	Undertake an occupational health and safety (OHS) audit at all the facilities by an organization / individual acceptable to IFC and HeidelbergCement to determine compliance with national standards, and accepted international standards. This is to include a review of Life, Fire and Safety requirements and development of an appropriate emergency response plan at all facilities.	Submission of audit findings.	Nine months after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier.
PS1	Based upon the findings of the OHS audit, agree with IFC on an action plan to address the audit findings for the respective facilities.	Submission of agreed action plans.	One year after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier.
PS1	Implement a formal OHS system at all facilities which integrates the findings of OHS audit.	Submission of OHS system documentation.	Eighteen months after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier.
PS1	Develop a capacity building programme, in agreement with IFC, at all facilities to support implementation of the EMS and OHS systems. Thereafter, implement the programme accordingly.	a) Submission of agreed capacity building programme. b) Submission of training records and finalized EMS / OHS documentation.	a) Nine months after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier. b) Two years after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier.

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PS3	Develop and implement an air quality (point source and fugitive emissions) and surface water quality monitoring program which is compliant with IFC and HeidelbergCement's requirements at all facilities.	a) Submission of air and water quality monitoring programme. b) Annual submission of monitoring data.	a) One year after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier. b) Information to be provided in Annual Monitoring Report.
PS3	Compile a detailed Rehabilitation and Closure Plan for all mines / quarries owned by the individual facilities. The individual Plans must include an annual reclamation and plantation plan, and a conceptual plan for mine / quarry closure.	Submission of Rehabilitation and Closure Plans.	One year after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier.
PS3	Implement the Rehabilitation and Closure Plans for all mines / quarries.	Photographic evidence / reports.	Updated information to be provided in Annual Monitoring Report.
PS 4	Compile a protocol for the use of firearms by security personnel at facilities where firearms are used, and implement ongoing training.	a) Submission of protocol. b) Training records.	a) One month after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier. b) Information to be provided in Annual Monitoring Report.
PS 5	a) Where resettlement is to occur, notify IFC. b) As applicable, both parties to agree upon Terms of Reference (ToR) for the Resettlement Action Plan (RAP) and the organization appointed to	a) Written correspondence confirming relocation is to commence. b) Submission of agreed ToR / appointment of organization. c) Submission of agreed RAP.	a) Six months prior to relocation. b) Prior to commencement of RAP. c) Prior to relocation.

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	undertake the RAP. c) Where applicable to new developments, including the new facility in West Africa, undertake and implement a RAP acceptable to both parties and compliant with IFC Performance Standards.		

Tanzania: Site Specific Environmental and Social Action Plan – December 2009

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PS3	Implement a method to treat waste water so as to comply with IFC's requirements i.e., water quality discharge parameters, for all waste water generated at the site.	a) Submission of plan defining the treatment method which is acceptable to IFC. b) Complete implementation of agreed method. c) Submission of monitoring data.	a) One year after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier. b) Two years after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier. c) Information to be provided in Annual Monitoring Report.
PS3	Enclose existing clinker storage area and construct a silo for reject clinker.	a) Submission of design information. b) Complete implementation / construction associated with clinker storage area and new silo. Provision of photographic evidence to IFC.	a) One year after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier. b) Thirty months after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier.
PS 3	Install emission control equipment on Lines 2 and 3 so as to comply with national / IFC requirements for particulate matter.	a) Submission of tender documentation. b) Submission of emissions monitoring reports to IFC within six months of commissioning new equipment.	a) April 2011 for Line 2, and December 2011 for Line 3. b) Commissioning of new equipment following eighteen months of operation for kiln 2, and one year of operation for Line 3.

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PS 3	a) Both parties to agree on an acceptable SO ₂ and NOX emission level for Lines 2 & 3. b) Implement appropriate measures to control SO ₂ and NOX emission levels for Lines 2 & 3 within the agreed time schedule.	a) Submission of a feasibility study confirming proposed SO ₂ and NOX levels for both lines. This study is to confirm the equipment to be utilized to control emissions and include an air quality modeling study for SO ₂ and NOX. Note: The Terms of Reference for this study and the organization that undertakes the study are to be acceptable to both parties. b) Submission of emission monitoring reports to IFC within six months of commissioning new equipment.	a) Completion of feasibility study by October 2010 and, on that basis, agreement on emissions levels in writing by December 2010. b) Commissioning of new equipment to achieve agreed emissions levels for SO ₂ and NOX following eighteen months of operation for kiln 2, and one year of operation for Line 3.
PS8	Establish a Chance-Find-Protocol to ensure appropriate action if future mining operations reveal any cultural artifacts.	Operational procedure submitted to IFC for review.	Condition of disbursement.

Ghana: Site Specific Environmental and Social Action Plan – December 2009

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PS 3	Ensure capacity of clinker stored on-site at Takoradi is limited to that available in silos i.e., no storage of clinker in the open to occur.	Photographic evidence indicating removal of existing clinker as stored adjacent to boundary wall.	One year after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier, if capex is not required. If capex is required, two years after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier.

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PS 3	Cease sale of used oil containers (plastic) at Takoradi facility to communities, and identify alternative suitable methods of disposal.	Report detailing revised disposal method acceptable to IFC.	Condition of disbursement.

Gabon: Site Specific Environmental and Social Action Plan – December 2009

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PS 3	Agree with IFC on a plan to repair the ESP within time-frames suitable to both parties.	Submission of agreed plan.	Six months after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier.
PS 3	Replace existing wet kiln process with a dry kiln that includes emission control that compiles with IFC requirements, or implement a solution acceptable to IFC and HeidelbergCement.	a) Completion of a comprehensive technical/economic study- technical, environmental and social analysis, business plan, availability of adequate limestone reserves (before obtaining relevant permits), budget - establishing the viability of the new dry kiln / or indication of an alternative solution acceptable to IFC. b) All relevant approvals obtained by HeidelbergCement and submission of tender documentation / granting of permits for limestone reserves / environmental approval enabling the conversion of the kiln from a wet to dry process.	a) One year after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier. b) Two years following approval of the comprehensive and technical/economic study. c) Two years following final approval of the project if the wet kiln is to be replaced with a dry kiln, or one year following final approval of the project if an alternative solution is agreed upon by IFC and HC.

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		c) Decommissioning of wet kiln / commissioning of dry kiln.	
PS 3	Cease the use of magnesite chrome bricks in the kiln.	Submission of order confirming supply of alternative bricks.	Six months after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier.
PS 3	Identify and implement a suitable disposal method for existing (current and used) magnesite chrome bricks in agreement with IFC.	Report defining alternative disposal method.	Six months after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier, with implementation verified via Annual Monitoring Report.
PS 3	Undertake a review based on what is practically feasible to identify locality of used magnesite chrome bricks as previously sold to determine implications for public health and safety and implement remedial measures where necessary to eliminate public health and safety risks.	Submission of report to IFC.	Nine months after; (i) a half of IFC's equity has been disbursed or; (ii) the first two IFC equity disbursements have been completed, whichever is earlier.